Chapter 6
Federal Facility Cleanups

Departments and agencies of the federal government manage a variety of industrial activities at 27,000 installations. Due to the nature of such activities, whether they are federally or privately managed, federal installations may be contaminated with hazardous substances. Generally, contaminated facilities are subject to CERCLA requirements.

Although federal facilities comprise only a small percentage of the community regulated under CERCLA, federal facilities are usually larger and more complex than their private industrial counterparts. Because of their size and complexity, compliance with environmental statutes may present unique management issues for federal facilities.

6.1 The Federal Facilities Program

CERCLA Section 120(a) requires that federal facilities comply with CERCLA requirements to the same extent as private facilities. Generally, Executive Order 12580 delegates the President's authority under CERCLA to federal departments and agencies, making them responsible for all clean-up activities at their facilities. At federal facilities that are National Priorities List (NPL) sites, which are sites having the highest priority for remediation under Superfund, CERCLA mandates that cleanups be conducted under interagency agreements (IAGs) between EPA and relevant federal agencies. States are often a party to these agreements as well. To ensure federal facility compliance with CERCLA requirements, EPA not only provides technical advice and assistance, but also takes enforcement action when appropriate.

In addition to CERCLA, there exists a range of authority and enforcement tools under state statutes that apply to non-NPL federal facility sites. Indian tribes may also be involved in federal agency compliance with environmental regulations when acting as either lead or support agencies for Superfund response actions.

6.1.1 Federal Facility Responsibilities Under CERCLA

Federal departments and agencies are responsible for identifying and addressing hazardous waste sites at the facilities that they own or operate. They are required under CERCLA to comply with all provisions of federal environmental statutes and regulations and all applicable state and local requirements during site cleanup.

6.1.2 EPA's Oversight Role

EPA oversees and assists federal agencies with clean-up activities. EPA responsibilities include evaluating sites for the NPL, negotiating or re-negotiating and amending IAGs, promoting community involvement through site-specific advisory boards and restoration advisory boards, potentially selecting or assisting in the determination of clean-up remedies, concurring with clean-up remedies, providing technical advice and assistance, reviewing federal agency pollution abatement plans, and resolving disputes regarding noncompliance. To fulfill these responsibilities, EPA relies on personnel from Headquarters, Regional offices, and states. This includes personnel from the Federal

Facilities Enforcement Office (FFEO) in the Office of Enforcement and Compliance Assurance (OECA) and the Federal Facilities Restoration and Reuse Office (FFRRO) in the Office of Solid Waste and Emergency Response.

To track the status of a federal facility, EPA uses a number of information systems. The Facility Index System provides an inventory of federal facilities subject to environmental regulations. Through the CERCLA Information System (CERCLIS), EPA maintains a comprehensive list of all reported potentially hazardous waste sites, including federal facility sites. CERCLIS also contains clean-up project schedules and achievements for federal facility sites. The list of federal facility sites potentially contaminated with hazardous waste, required by CERCLA 120(c), is made available to the public through the Federal Agency Hazardous Waste Compliance Docket and through regular docket updates published in the *Federal Register*.

6.1.3 The Roles of States and Indian Tribes

Under the provisions of CERCLA Section 120(f), state and local governments are encouraged to participate in planning and selecting remedial actions to be taken at federal facility NPL sites within their jurisdiction. State and local government participation includes, but is not limited to, reviewing site information and developing studies, reports, and action plans for the site. EPA encourages states to become signatories to the IAGs that federal agencies must enter into with EPA under CERCLA Section 120(e)(2). State participation in the CERCLA clean-up process is carried out under the provisions of CERCLA Section 121.

Cleanups at federal facility sites not on the NPL are carried out by the federal agency that owns or operates the site. Federal agencies use the CERCLA clean-up process outlined in the National Contingency Plan at these sites. In addition to CERCLA, these cleanups are subject to state laws regarding response actions. A state's role at a non-NPL federal facility site, therefore, will be determined both by that state's clean-up laws and CERCLA.

CERCLA Section 126 mandates that federally recognized Indian tribes be afforded substantially the same treatment as states with regard to most CERCLA provisions. Thus, the role of a qualifying Indian tribe in a federal facility cleanup would be substantially similar to that of a state. To qualify, a tribe must be federally recognized; have a tribal governing body that is currently performing governmental functions to promote the health, safety, and welfare of the affected population; and have jurisdiction over a site.

6.2 Fiscal Year 1994 Progress

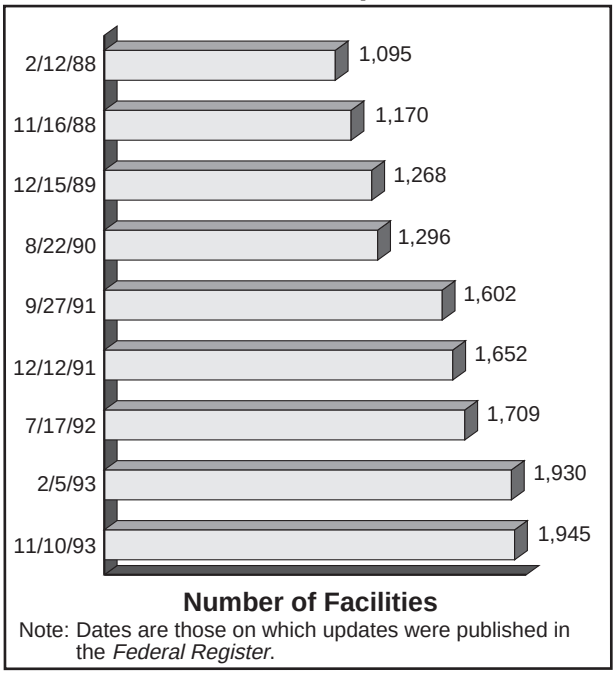
FFEO and FFRRO, in conjunction with various other EPA Headquarters offices, Regional offices, and states, ensure federal department and agency compliance with CERCLA and Resource Conservation and Recovery Act requirements. Progress in achieving federal facility compliance may be measured by the status of federal facility sites on the Federal Agency Hazardous Waste Compliance Docket and on the NPL, and by the execution of IAGs for federal facility sites.

6.2.1 Status of Facilities on the Federal Agency Hazardous Waste Compliance Docket

Federal facilities where hazardous waste is managed or from which hazardous substances have been released are identified on the Federal Agency Hazardous Waste Compliance Docket. The docket was established under CERCLA Section 120(c) and functions as a comprehensive record of the Superfund federal facilities program. It includes the compliance status of each federal facility. Information submitted to EPA on identified facilities is compiled and maintained in the docket and then made available to the public.

The initial federal agency docket was published in the *Federal Register* on February 12, 1988. At that time, 1,095 federal facilities were listed on the

Exhibit 6.2-1
Number of Federal Facilities on the Federal Agency Hazardous Waste Compliance Docket



Note: Dates are those on which updates were published in the *Federal Register*.

Source: Federal Agency Hazardous Waste Compliance Docket.

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Exhibit 6.2-2
Distribution of Federal Facilities on the Federal Agency Hazardous Waste Compliance Docket

Department of Defense	863	(44%)
Department of the Interior	428	(22%)
Department of Agriculture	122	(6%)
Department of Transportation	111	(6%)
Department of Energy	90	(5%)
Ownership Not Yet Known	76	(4%)
Tennessee Valley Authority	42	(2%)
Corps of Engineers, Civil	36	(2%)
Veterans Administration	34	(2%)
United States Postal Service	24	(1%)
Department of Justice	23	(1%)
General Services Administration	21	(1%)
Environmental Protection Agency	20	(1%)
National Aeronautics and Space Administration	17	(1%)
Department of Commerce	12	(0.6%)
Department of Health and Human Services	11	(0.6%)
Department of the Treasury	7	(0.4%)
Department of Housing and Urban Development	4	(0.2%)
Central Intelligence Agency	2	(0.1%)
Department of Labor	1	(0.05%)
Small Business Administration	1	(0.05%)
TOTAL	1,945	

Note: Percentages total less than 100% due to rounding.

Source: Federal Agency Hazardous Waste Compliance Docket.

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docket. Exhibit 6.2-1 shows the increase in the number of sites on the docket since its first publication. Most recently, the docket update of November 10, 1993, listed a total of 1,945 facilities. Of this total, the Department of Defense (DOD) owned or operated 863 (44 percent) of the facilities and the Department of the Interior (DOI) owned or operated 428 (22 percent). The remainder were distributed among 18 other federal departments, agencies, and instrumentalities. A breakdown of facilities on the docket by federal department or agency is illustrated in Exhibit 6.2-2.

6.2.2 Status of Federal Facilities on the NPL

To distinguish the increasing number of federal facility NPL sites from non-federal NPL sites, NPL updates list federal facility sites separately from non-federal sites. NPL updates also contain language that clarifies the roles of EPA and other federal departments and agencies with regard to federal facility sites. Consistent with Executive Order 12580 and the National Oil and Hazardous Substances Pollution Contingency Plan, EPA is typically not the lead agency for federal facility sites on the NPL; federal agencies are usually lead agencies for their own facilities. EPA is, however, responsible for overseeing federal facility compliance with CERCLA.

At the end of FY94, there were 160 federal facility sites proposed to or listed on the NPL,

including 150 final and 10 proposed sites. These totals included 10 sites that were proposed for listing and 24 proposed sites that were listed as final during FY94.

Federal departments and agencies made substantial progress during FY94 toward cleaning up federal facility NPL sites. Activity at federal facility NPL sites during the year included the start of approximately 60 remedial investigation/feasibility studies (RI/FSs), 50 remedial designs (RDs), and 40 remedial actions (RAs). Also, 60 records of decision (RODs) were signed, and 17 sites achieved construction completion. Ongoing activities at the end of FY94 included 486 RI/FSs, 60 RDs, and 79 RAs.

6.2.3 Interagency Agreements Under CERCLA Section 120

IAGs are the cornerstone of the enforcement program for federal facility NPL sites. They are enforceable documents and contain, among other things, a description of remedy selection alternatives, schedules of clean-up activities, and provisions for dispute resolution. During FY94, nine CERCLA IAGs were executed to accomplish hazardous waste cleanup at federal facility NPL sites. Of the 150 final federal facility sites listed on the NPL, 129 were covered by enforceable agreements by the end of the fiscal year.

IAGs between EPA and each responsible federal department or agency, to which states maybe signatories, document some or all of the phases of remedial activity (RI/FS, RD, RA, operation and maintenance) to be undertaken at a federal facility NPL site. IAGs formalize the schedule and procedures for submission and review of documents and include a timeline for remedial activities in accordance with the requirements of CERCLA Section 120(e). They also must comply with the public involvement requirements of CERCLA Section 117.

Included in IAG provisions are mechanisms for resolving disputes between the signatories. EPA can also assess stipulated penalties for noncompliance with the terms of IAGs. The agreements are enforceable by the states, and citizens may seek to enforce them through civil suits. Penalties may be imposed by the courts against federal departments and agencies in successful suits brought by states or citizens for failure to comply with IAGs.

6.3 Federal Facility Initiatives

The growing awareness of environmental contamination at federal facilities has increased the public demand for facility cleanup. To address this demand, EPA has worked to establish priorities for clean-up programs and thereby maximize the cleanups that can be accomplished with the finite resources available. In FY94, EPA reorganized its federal facility enforcement offices (FFRRO and FFEO) to make them more effective. The Agency also continued efforts to clean up closing military bases, accelerate cleanup, address issues through interagency forums, and promote the use of innovative technologies at federal facility sites.

6.3.1 Military Base Closure

During the fiscal year, DOD with EPA and the states began implementing the Fast Track Clean-Up Program that was developed in response to the Base Realignment and Closure (BRAC) Act and published as a DOD directive in September 1993. The Fast Track Clean-Up Program focuses clean-up efforts on facilitating reuse of bases scheduled for closure and speeding the economic recovery of communities associated with those bases.

Under the Fast Track Clean-Up Program, EPA, DOD, and the states established BRAC clean-up teams (BCTs) at 75 bases in FY94. BCTs were identified and trained in November 1993. EPA, DOD, and the states focused efforts on the BRAC bases with the greatest potential for economic reuse. Of the 75 bases with BCTs, 24 are final NPL sites, 3 are sites proposed to the NPL, and 19 are sites likely to be proposed to the NPL.

Major components of the Fast Track Clean-Up Program include identifying uncontaminated parcels, accelerating cleanup, enhancing community involvement, facilitating leasing agreements,

encouraging removal actions, providing technical assistance at non-NPL bases, and integrating cleanup with economic development. The program aims to maximize and expedite the reuse of bases scheduled for closure in a manner consistent with the requirements of CERCLA Section 120(h).

EPA's approach in supporting DOD in the Fast Track Clean-Up Program was outlined in the Model Accelerated Clean-Up Program guidance. In compliance with the terms of the guidance, EPA assigned a Remedial Project Manager (RPM) to each installation with a BCT. The RPM serves as an integral part of the clean-up team and spends a significant amount of time at the base. EPA also provided technical experts in areas such as hydrogeology, toxicology, ecological assessment, field support, and legal review to support the effort. DOD supported EPA by committing approximately 100 full-time equivalent personnel to aid in achieving the objectives of the Fast Track Clean-Up Program. Most of the DOD resources were assigned to EPA's Regional offices.

6.3.2 Accelerated Cleanups at Federal Facilities

EPA, with DOD and the Department of Energy (DOE), published *Guidance on Accelerating CERCLA Environmental Restoration at Federal Facilities* in August 1994. The guidance identifies Superfund Accelerated Clean-Up Model components that provide opportunities for speeding cleanup at federal facility NPL sites. The guidance also addresses site assessment, innovative technology, the impact of accelerated cleanup on the NPL, presumptive remedies, early and long-term actions, public involvement, Regional decision teams, and the effect of accelerated cleanup on sites with existing federal facility IAGs. Also in conjunction with other federal agencies, EPA initiated the development and promotion of presumptive remedies at closing military bases. Presumptive remedies are preferred technologies for common categories of sites based on historical patterns of remedy selections, as well as scientific and engineering evaluations of performance data on technology implementation. Presumptive remedies are expected to reduce the cost and time required to clean up similar sites, to promote consistency in remedy selection, and to facilitate the expeditious reuse of properties by surrounding communities.

6.3.3 Interagency Forums

Through its participation in interagency organizations, EPA made significant progress in addressing concerns associated with federal facility cleanup.

Federal Facilities Environmental Restoration Dialogue Committee

The Federal Facilities Environmental Restoration Dialogue Committee (FFERDC), established in 1992 as an advisory committee under the Federal Advisory Committee Act, provided a forum for identifying and refining issues related to environmental restoration activities at federal facilities. During FY94, FFERDC contributed to the debate on Superfund reform and held national discussions on improving the federal government's approach to environmental management.

Defense Environmental Restoration Task Force

EPA continued to participate in the Defense Environmental Restoration Task Force (DERTF). The goals of DERTF and DOD are to examine environmental issues associated with the cleanup and reuse of closing military installations and to identify and recommend ways to expedite and improve environmental response actions at military installations scheduled to be closed. To support its activities, DERTF established five working groups. Each working group is addressing one of the following topics: fast track clean-up implementation, environmental baseline surveying, leasing, future land use, and environmental justice.

BRAC Clean-Up Teams

With DOD and the states, EPA formed BCTs at all major installations scheduled for closure and

conducted three training conferences for BCT members. EPA and DOD prepared and conducted bottom-up reviews of 77 BRAC clean-up plans for closing installations, established restoration advisory boards (RABs) at closing installations, provided seven RAB training workshops, and determined, by consensus, the suitability of property to transfer or lease for reuse. As mandated by the Community Environmental Response Facilitation Act, EPA reviewed and where appropriate concurred in the identification of uncontaminated parcels of property that are part of an NPL site.

Environmental Management Advisory Board

With DOE, EPA participated in the Department's Environmental Management Advisory Board. The board consists of representatives from industry, academia, and the environmental community. It provides information, advice, and recommendations on issues confronting the national environmental management program. These issues include clean-up criteria and risk assessment, land use, priority setting, management effectiveness, cost-versus-benefit analyses, and strategies for determining the future national configuration of waste management and disposal facilities.

6.3.4 Innovative Technology Development

FFRRO and FFEO, in conjunction with the Technology Innovation Office (TIO), the Office of Research and Development, and the Office of Policy, Planning, and Evaluation, coordinated efforts to establish federal facilities as testing and development centers for innovative technologies. In August 1994, the EPA Administrator signed and issued a policy document, the *EPA Policy for Innovative Environmental Technologies at Federal Facilities.* This policy advocates and reaffirms EPA's commitment to promote the use and development of innovative technologies at federal facilities. EPA, along with DOD and DOE, also signed an interagency guidance document on accelerating CERCLA environmental restoration at federal facilities. The guidance includes a provision encouraging accelerated cleanup at federal facilities through the use of innovative technologies. It also gives EPA discretion to allow changes in scheduled activities and to provide technical support to federal agencies to facilitate the use of innovative technologies. Decisions about using innovative technologies are to be made with the support of EPA, state agencies, the lead federal agency, and the public.

TIO, FFRRO, and FFEO engaged in several other efforts to promote the use of innovative technologies at federal facility sites. For example, TIO, FFRRO, and FFEO formed the Federal Facilities Forum to serve as a venue for problem-solving and exchanging information between EPA Regions and federal agencies on improved technology to help accelerate restoration and reuse of federal facilities. TIO, FFRRO, and FFEO also initiated efforts to start the Multisite Technology Confirmation Initiative. Through this initiative, the Agency seeks to identify innovative technologies that have been demonstrated at the full-scale level and to facilitate their use at additional sites. By developing information on the cost and performance of innovative technologies, this initiative should enhance the acceptability and use of innovative technologies for remediation at federal facilities. In other efforts, the Agency participated in public-private partnerships and the Develop On-Site Innovative Technologies (DOIT) Committee.

Public-Private Partnerships

Through the use of public-private partnerships, EPA has demonstrated and evaluated various innovative hazardous waste technologies. For example, EPA, DOE, and the State of Florida continued to implement a public-private partnership through DOE's Innovative Treatment Remediation Demonstration Program for the remediation of ground water at the DOE Pinellas Plant in Florida. The parties are working to select the appropriate technology for the site. At McClellan Air Force Base, EPA continued a public-private partnership project with the State of California, the Air Force, and several private firms. Two technology demonstrations were held at McClellan between July and October of 1994.

Through a cooperative agreement between TIO and Clean Sites, Inc., additional public-private partnerships between federal agencies, federal regulators, state regulators, and private companies are being established. Efforts are underway to establish a public-private partnership at the Joliet Army Ammunition Plant, in Illinois, for the remediation of explosives-contaminated soil, using an innovative technology. Clean Sites, Inc., is working with the Remedial Technology Development Forum to demonstrate an innovative technology at DOE's Paducah Gaseous Diffusion Plant in Kentucky. Public-private partnerships are also being established at the Massachusetts Military Reservation, the Otis Air National Guard Site, and the Naval Air Station/ North Island.

Develop On-Site Innovative Technologies Committee

In other FY94 activity, EPA continued to work closely with DOE, DOD, DOI, and the Western Governors Association (WGA) to bring about environmental regulatory reform at the state and federal level. EPA is represented on the DOIT Committee, a federal advisory committee created to implement a memorandum of understanding (MOU) signed by DOD, DOE, DOI, EPA, and WGA. Pursuant to the MOU, the signatories are cooperating to expedite waste site cleanups and advance better technologies. The DOIT Committee, seeking to analyze technology demonstrations and solicit stakeholder involvement at federal facilities, has four working groups (mixed waste, mining waste, munitions, hazardous waste at military bases). In FY94, the workgroups identified a number of sites for technology demonstrations and made suggestions for new approaches.

6.4 CERCLA Implementation at EPA Facilities

Of the 1,945 sites on the Federal Agency Hazardous Waste Compliance Docket at the end of FY94, 20 were EPA-owned or operated. Of these EPA-owned or operated sites, one was listed on the NPL. A report, required by CERCLA Section 120(e)(5), on clean-up progress at these 20 facilities is provided below.

6.4.1 Requirements of CERCLA Section 120(e)(5)

CERCLA Section 120(e)(5) requires an annual report to Congress from each federal department, agency, or instrumentality on its progress in implementing Superfund at its facilities. Specifically, the annual report to Congress is to include, but need not be limited to, the following items:

- Section 120(e)(5)(A): A report on the progress in reaching IAGs under CERCLA Section 120(e)(2);
- Section 120(e)(5)(B): The specific cost estimates and budgetary proposals involved in each IAG;
- Section 120(e)(5)(C): A brief summary of the public comments regarding each proposed IAG;
- Section 120(e)(5)(D): A description of the instances in which no agreement (IAG) was reached;
- Section 120(e)(5)(E): A progress report on conducting RI/FSs required by CERCLA Section 120(e)(1) at NPL sites;
- Section 120(e)(5)(F): A progress report on remedial activities at sites listed on the NPL; and
- Section 120(e)(5)(G): A progress report on response activities at facilities that are not listed on the NPL.

CERCLA also requires that the annual report contain a detailed description, by state, of the status of each facility subject to Section 120(e)(5). The status report must include a description of the hazards presented by each facility, plans and schedules for initiating and completing response actions, enforcement status (where applicable), and an explanation of any postponement or failure to complete response actions. EPA gives high priority to maintaining compliance with CERCLA

requirements at its own facilities. To ensure concurrence with all environmental statutes, EPA uses its environmental compliance program to heighten regulatory awareness, identify potential compliance violations, and coordinate appropriate corrective action schedules at its laboratories and other research facilities.

EPA also has instituted an internal program review process to identify facilities with potential environmental violations of federal (including CERCLA), state, and local requirements. By performing these detailed facility analyses, EPA is better able to assist facilities in complying with federal, state, and local requirements.

6.4.2 Progress in Cleaning Up EPA Facilities Subject to Section 120 of CERCLA

At the end of FY94, the Federal Agency Hazardous Waste Compliance Docket listed 20 EPA-owned or operated facilities, including one that has been listed on the NPL (the Old Navy Dump/ Manchester NPL site in Washington). Three of the sites (Casmalia Resources in Casmalia, California; the Brunswick Facility in Brunswick, Georgia; and the Philadelphia Site in Philadelphia, Pennsylvania) may have been listed on the docket in error. EPA is currently investigating those listings. EPA has evaluated and, as appropriate, undertaken response activities at the 17 EPA sites on the docket for which it is responsible, including the site on the NPL. As required by CERCLA Section 120(e)(5), Exhibit 6.4-1 provides the status, by state, of EPA-owned or operated sites and identifies the types of problems and progress of activities at each site. EPA facilities that have undergone significant response activities in FY94 are discussed in detail below. As required for EPA-owned or operated NPL sites, the information presented below for the Old Navy Dump/Manchester NPL Site provides a report on progress in meeting Section 120 requirements for reaching IAGs, conducting RI/FSs, and providing information on the status of remedial activities. For other EPA-owned or operated sites on the docket, the information presented below provides a report on progress in conducting response activities at the facilities.

National Air and Radiation Environmental Laboratory, Alabama

EPA's air and radiation laboratory formerly operated at a site near its current location at Gunter Air Force Base in Montgomery, Alabama. During operations at the original site, waste solvents, including xylene and benzene, were discharged into a pit adjacent to the laboratory building. The releases were identified by EPA's internal auditing program. The site was remediated initially by removing the accessible contaminated soil and replacing it with uncontaminated soil. Then EPA, in conjunction with the Underground Injection Control Program of the Alabama Department of Environmental Management, determined the extent of the remaining contamination and developed an appropriate mitigation program. EPA is monitoring the ground-water wells on the property regularly and initiating a program to pump ground water from the contaminated area.

EPA Headquarters, District of Columbia

EPA Headquarters was reported as a small-quantity generator of hazardous wastes during FY93 because of the presence of unopened containers of photographic development chemicals. Through pollution prevention and waste minimization initiatives undertaken in FY94, EPA Headquarters is attempting to eliminate this small quantity wastestream.

EPA Central Regional Laboratory, Maryland

EPA conducted an on-site investigation of ground-water contamination at the EPA Central Regional Laboratory in Annapolis, Maryland. Although the State of Maryland is satisfied that hazardous substances have not been released into the environment and that further response action is not required, the Agency installed a homogenizing tank and continued to maintain monitoring wells at the site. During FY94, EPA continued monitoring of the wells with no contamination found.

Exhibit 6.4-1
Status of EPA Facilities on the Federal Agency Hazardous Waste Compliance Docket

State	EPA Facility	Known or Suspected Problems	Project Status
AL	National Air and Radiation Environmental Laboratory (formerly known as the Eastern Environmental Radiation Facility)	Contained soil and ground-water contamination	PA completed; ongoing monitoring and response activities.
AR	Combustion Research Facility	No contamination	PA completed 4/89; no further remedial action planned.
CO	National Enforcement Investigation Center	No contamination	PA completed 4/88; no further remedial action planned.
DC	EPA Headquarters	Small-quantity generator	EPA undertaking pollution prevention and waste minimization efforts to eliminate wastestream.
IL	Region 5 Environmental Services Division Laboratory	No contamination	PA completed 4/88; no further remedial action planned.
KS	EPA Mobil Incinerator	No contamination from mobile incinerator	No further remedial action planned; mobile incinerator removed from site.
KS	Region 7 Environmental Services Divison Laboratory	No contamination	PA completed 4/88; no further remedial action planned.
MD	EPA Central Regional Laboratory	No contamination	PA completed 4/88. SI completed; monitoring of site ongoing.
MI	Motor Vehicle Emission Laboratory	No contamination	PA conducted 3/90; no further remedial action planned.
NC	EPA Tech Center	No contamination	PA conducted 8/91; no further remedial action planned.
NJ	EPA Edison Facilities	No contamination that poses a threat to the environment	PA/SI prompted additional investigative work.
OH	AWBERC Facility	No contamination	PA completed 4/88; no further remedial action planned.
OH	Center Hill Hazardous Waste Engineering Research Laboratory	No contamination	PA completed 4/88; no further remedial action planned.
OH	Testing and Evaluation Facility	No contamination	PA completed 4/88; no further remedial action planned.
OR	EPA Laboratory	Small-quantity generator	Conditionally exempt from PA requirements.
TX	EPA Laboratory	Small-quantity generator	Conditionally exempt from PA requirements.
WA	Old Navy Dump/Manchester NPL Site (formerly known as the Region 10 Environmental Services Divison Laboratory)	Soil and sediment contamination attributable to DOD ownership	Site listed on the NPL in 5/94; IAG negotiations initiated 7/94; RI/FS to be performed in FY95.

Source: Hazardous Waste Compliance Docket and the Office of Administration and Resources Management.

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EPA Edison Facilities, New Jersey

The EPA Edison Facilities site was formerly the Raritan Depot, which was owned by DOD and used for munitions testing and storage. In 1963, the General Services Administration (GSA) took possession of the property and, in 1988, transferred approximately 200 acres of the site to EPA. Although residual contamination from past DOD and GSA activities at the facility persists, EPA has not stored, released, or disposed of any hazardous substances on the property.

A site inspection was conducted in FY91, following the discovery of a contaminated surface-water impoundment. The investigation resulted in the implementation of interim clean-up actions. Response activities have included spraying a rubble pile containing asbestos with a bituminous sealant; removing the liquid in the surface impoundment, excavating soil, installing a liner, and backfilling the impoundment with clean material; excavating and storing munitions; and removing underground storage tanks. EPA expects that DOD will pursue additional clean-up work at the site.

Old Navy Dump/Manchester NPL Site, Washington

EPA acquired this former Navy site from DOD in 1970 and used the land to construct an environmental testing laboratory in 1978. The property is also used for two other environmental laboratories run by the National Marine Fisheries Service and the Washington State Department of Ecology.

The property adjacent to the laboratories had been used by the Navy to conduct firefighting training exercises, maintain metal anti-submarine nets, and serve as a Navy landfill. Investigations of the property history revealed that in the 1940s and 1950s, the Navy had used a lagoon on the property to dispose of metal debris and other waste from the nearby Bremerton Naval Shipyard. Also, chemical residues from the Navy firefighting training school had been allowed to drain into the ground. In FY93, a preliminary assessment and site inspection of the property revealed the presence of hazardous substances in the soil, sediment, and surface-water run off. In January 1994, EPA proposed the site to the NPL, and in June 1994, EPA listed the site on the NPL.

Because the site is a former Navy site, the Defense Environmental Restoration Program for Formerly Used Defense Sites (FUDS) will provide funding for evaluating and correcting the hazardous conditions. Negotiations for an IAG for site cleanup were initiated in July 1994 and were ongoing as of the end of the fiscal year. Also during the year, the Seattle District of the U.S. Army Corps of Engineers was authorized under the Department of Defense's Environmental Restoration Program for FUDs to perform an RI/FS of the Old Navy Dump/Manchester NPL Site (FUDS Site No. F10WA011900) and to prepare a proposed plan and ROD. Initiation of the RI/FS is scheduled for FY95.